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HARTFORD FIRE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMERICAN PRESIDENT LINES, LTD., and
APL CO, Pte., LTD,

Plaintiff,

v.

HARTFORD FIRE INSURANCE COMPANY, a
corporation,

Defendant.

No. C05 4717 MMC

STIPULATED REQUEST FOR ORDER
GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE ;
ORDER THEREON

AND RELATED CROSS-COM, PLAINT

Pursuant to Local Rules 6-1(b), 6-2(a), and 16-2(d) and (e), Plaintiffs American President Lines Ltd. and APL Co.Pte., LTD. (collectively “APL”) and defendant Hartford Fire Insurance Company (“Hartford”) request relief from the Case Management Conference Schedule in the above-captioned matter.

Although the Case Management Conference had previously been continued shortly after the case was originally served, APL and Hartford have not settled the case and require additional

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MANAGEMENT SCHEDULE

1 time to finalize the settlement agreement and exchange the settlement funds. In addition,
2 Hartford requires additional time to enter the default judgment against cross-defendants, against
3 whom defaults have already been entered by this court. See Declaration of Sharon R. Biederman
4 submitted herewith.
5

6
7 It is hereby stipulated between APL and Hartford that the Case Management Conference
8 now set for Friday, July 14, 2006, be continued approximately three months or to another time
9 chosen by the court to allow the finalization of the settlement and the entry of the judgment
10 against cross-defendants.
11

12 It is also stipulated between APL and Hartford that all other court deadlines be vacated,
13 upon approval of the court, because the matter has been settled and a default judgment will be
14 entered against the cross-defendants.
15

16
17 Dated: 7/11/06 LUCAS VALLEY LAW

18
19 By: Mark K. de Langis
20 Mark K. de Langis
21 Attorneys for Plaintiffs, APL

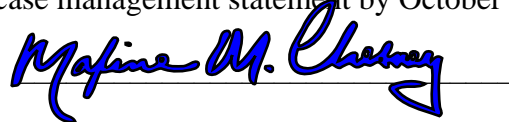
22 Dated: July 10, 2006 BIEDERMAN & ASSOCIATES

23
24 By: Sharon R. Biederman
25 Sharon R. Biederman
26 Attorneys for Defendant, Hartford

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MANAGEMENT SCHEDULE

PURSUANT TO STIPULATION, IT IS SO ORDERED. The July 14, 2006 case management conference is hereby CONTINUED to October 13, 2006 at 10:30 a.m. Unless a dismissal has been filed, the parties shall file a joint case management statement by October 6, 2006.

Dated: July 12, 2006

A handwritten signature in blue ink, reading "Mafine M. Cheney", is written over a horizontal line.

United States District Judge

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MANAGEMENT SCHEDULE